



ALONE Submission on the draft National Planning Statement on Planning Design Standards for Apartments

Department of Housing, Local Government and Heritage

7 July 2026



1. Introduction

ALONE welcomes the opportunity to respond to the draft National Planning Statement on Planning Design Standards for Apartments, 2026. ALONE is a national organisation supporting older people to age safely at home and in their communities. In 2025, ALONE supported more than 46,500 older people across its services. As both a service provider and an Approved Housing Body (AHB), ALONE has direct experience delivering and supporting housing for older people, including Housing with Support developments such as the Richmond Place demonstrator project in Inchicore.

Housing is one of the most significant challenges facing older people in Ireland today. 36% of older people assessed by ALONE in 2025 reported housing-related issues. At the same time, reliance on the private rental sector is increasing among older people¹, often in accommodation that is not suited to long-term ageing. Ireland's population aged 65 and over is projected to increase by 140% between 2022 and 2057², creating an urgent requirement for housing solutions that support independence, dignity and social inclusion. Government and Department of Housing policy is to support ageing in place³, which is key to healthy ageing and prevention of downstream healthcare costs.

By 2040, it is estimated that over 123,000 one- and two-bedroom homes will be required to meet the needs of older people, alongside 82,500 social homes built to Universal Design standards. Meeting this level of need requires a planned approach that delivers a full spectrum of housing options, from adaptable mainstream housing to supported and integrated housing models.

The draft Statement recognises that *“apartment schemes should be designed so that they are easy for people to use and to reflect the fact that all people experience changes in their abilities as they progress through the different stages of life”* (Page 26).

2. Key Recommendations

2.1 Apartment Mix and Supply

ALONE notes the proposed approach reduces fixed requirements relating to apartment mix, and places increased importance on the Housing Need and Demand Assessment (HNDA) process in determining an appropriate unit mix based on local need. The draft Statement also recognises that *“schemes to provide housing for older persons”* may require *“a specific mix of unit sizes”* (Page 17).

On building the right mix of social homes, the Department states that *“A good mix helps create vibrant, welcoming communities and supports efforts to end homelessness”*⁴; that *“about two-thirds of people on social housing waiting lists are single adults, so more studio and one-bedroom homes are needed”*; and that *“larger homes are also essential for big families”*. The same principles should apply to development of apartments for private and social use.

- **ALONE recommends that a mix of unit types is specified in the guidelines for general-needs apartment developments to ensure that demand is met while achieving a mix of residents.** In some cases, this could be informed by current and future demand estimates in line with Local Authorities' Housing Need and Demand Assessment, as is set out in the 2023 guidelines.

2.2 Minimum size and use of Universal Design

Although provision is made within the draft Statement that at least 25% of units should exceed minimum size standards (Page 19), this is a reduction from the previous guidelines whereby 50% of units in a scheme were required to exceed the minimum floor area by at least 10%. The minimum size of 32sqm for studio apartments has also been reduced from 37sqm. Our experience indicates that this will reduce the number of apartments built that are accessible for older and disabled people.

One purpose of the 50% guideline was to ensure that apartments could be developed which were suitable and adaptable for older residents in the context of an ageing population. Universal Design homes generally require a greater floor area; the 'Internal Layout Checklist for Universal Design Homes'⁵ highlights that a UD one-bedroom, 2 person home can be achieved with a floor area of 50 sqm. Fewer such apartments will be developed under the proposed guidelines, which will ultimately lead to challenges in housing our ageing population. Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible – but this will be challenging to achieve if homes are too small to allow for adaptability.

Of note, previous Government policy⁶ committed to “introduce measures to ensure that over a five year period delivery is increased to ensure that 30% of all new dwellings are built to incorporate universal design principles to accommodate our ageing population”, recognising the important role universal design principles should play in housing development.

- **ALONE recommends that the existing guidelines whereby 50% of units in a scheme are required to exceed the minimum floor area are maintained, and the existing minimum size requirement of studio apartments is maintained.**

2.3 Building Design and Amenity

While the draft Statement allows for design flexibility, it is important that homes remain accessible and usable for older residents.

In this context, ALONE recommends that the apartment design guidelines should:

- **Ensure adequate lift provision:** Requirements in respect of the number of units per floor per lift and stair core have been removed. This is likely to have the effect of decreasing the number of lifts and stair cores relative to the number of units in developments,

¹ There has been an 83% increase in older people in the private rental sector (CSO, 2022).

² [Press Statement for International Day of Older Persons September 2024 - CSO - Central Statistics Office](#): The number of people aged 65 years and over in Ireland is projected to rise by over 1 million people by 2057, from 781,000 in 2022 to 1.9 million in 2057; which represents an increase of approximately 140%.

³ [‘Delivering Housing for Older People’](#), Department of Housing, Local Government and Heritage (2025)

⁴ [‘Building the Right Mix of Social Homes’](#), Department of Housing, Local Government and Heritage (2025)

⁵ [‘Internal Layout Checklist for Universal Design Homes’](#), Centre for Excellence in Universal Design, National Disability Authority (2025)

⁶ [‘Housing Options for our Ageing Population Policy Statement’](#), Government of Ireland (2019)

increasing their use. Recognising that lift outages can effectively confine older residents to their homes, a maximum number of units per floor per core should be included. This also has significant implications for fire safety and emergency access, with the potential for increased travel distance for those reliant on the lift. ALONE are seeing year-on-year increases among older people reporting mobility issues⁷.

- **Maintain existing requirements for dual aspect ratios:** Reduced requirements for dual aspect ratios will impact on health and quality of life. Research has highlighted that single aspect apartments are at an increased risk of overheating⁸⁹, which will pose a health risk for older residents with health difficulties in the context of rising temperatures.
- **Maintain existing standards for provision of communal and private amenity (i.e. garden and balcony) spaces,** which are particularly vital for older people with poor mobility.

3. Conclusion

ALONE recognises the ongoing challenges in delivery of sufficient housing and welcomes efforts to promote construction. However, it is vital that the housing that is delivered meets the needs of our population – or it will risk exacerbating challenges in relation to accessibility, health and safety, and quality of life. The proposed guidelines, taken in the round, allow for the provision of smaller apartments, with reduced access to lifts, garden and balcony spaces, and increased risk of overheating. We recommend that the Department consults further with the Centre of Universal Design at the National Disability Authority, DPOs, and organisations working with older people, to further inform these guidelines. ALONE will be pleased to contribute further should this be required.

⁷ 'ALONE ECC End of Year Report 2025', ALONE (2026)

⁸ 'Research report on overheating risk in dwellings', prepared for the SEAI (2019)

⁹ 'Dwelling overheating in risk in cool climates: assessing the risk in the context of retrofit and climate change in Ireland', Mulville, Harrington, Li, Raushan, Essien-Thompson, Ahern (2025)